

IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
v. : Docket No. 0313 2:14CR 00285-001
RAE TALLEY :

MOTION FOR RETURN OF PASSPORT

TO THE HONORABLE PAUL S. DIAMOND, JUDGE OF THE SAID COURT:

Rae Talley, by her attorney, George Henry Newman, respectfully moves this Court for an Order to Return Ms. Talley's passport to her forthwith for the following reasons:

1. Ms. Talley was released on \$10,000.00 OR bail, effective June 26, 2014.
2. On June 30, 2014, Ms. Talley changed her plea to guilty.
3. On April 29, 2016, this Court sentenced Ms. Talley to 5 years' probation, the first months' of which were to be served on house arrest (electronic monitoring).
4. Ms. Talley has completed her electronic monitoring, and is now employed as a consultant.
5. Ms. Talley's work involves travel to various places, sometime^s outside of the United States. X
6. Ms. Talley requires possession of her passport in order to travel.
7. The Government, Mary Kay Costello, Assistant United States Attorney has indicated that she has no objection to the return of Ms. Talley's passport to her.
8. Ms. Talley's probation officer, Julie M. Persinger has also indicated that she has no objection to receiving her passport (see letter attached). X

WHEREFORE, it is respectfully requested that this Honorable Court order the return to Ms. Talley the return of her passport, forthwith.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. H. Newman', is written over a horizontal line.

GEORGE HENRY NEWMAN

100 S. Broad St., Suite 2126

Philadelphia, PA 19110

215-592-9400

Attorney for Rae Talley

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
PROBATION OFFICE
Harrisburg

DREW THOMPSON
CHIEF PROBATION OFFICER

November 10, 2016

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U.S. Department of State
CA/PPT/S/L/LA
44132 Mercure Circle
P.O. Box 1227
Sterling, VA 20166-122

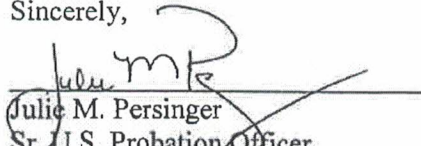
Re: Rae Lamise TALLEY
DOB: 6/6/1963
SSN: 182-54-2018

To Whom it May Concern:

On April 29, 2016, following her plea of guilty to conspiracy and wire fraud; aiding and abetting, Rae Talley was sentenced in the Eastern District of Pennsylvania to five years of concurrent probation on both counts. Ms. Talley is a resident of Harrisburg, Pennsylvania, and supervision of her case was undertaken by our office. Ms. Talley commenced probation on April 29, 2016, and is scheduled to complete her term of supervision on April 28, 2021.

This letter serves as confirmation that Ms. Talley has requested and received my permission to apply for the return of her surrendered passport. If you require anything further from my office, please feel free to contact me.

Sincerely,


Julie M. Persinger
Sr. U.S. Probation Officer

228 Walnut St.
Harrisburg, PA 17101
717-901-2881
julie_persinger@pamp.uscourts.gov

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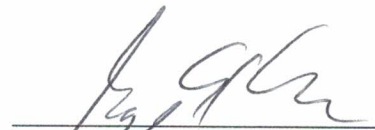
PROOF OF SERVICE

I hereby certify this *9th* day of *November*, 2017 that I am serving a true and correct copy of the within Order upon the person(s) and in the manner indicated below.

The Honorable Paul S. Diamond
US Courthouse-Room 13614
601 Market Street
Philadelphia, PA 19106

Mary Kay Costello, AUSA
615 Chestnut Street-Suite 1250
Philadelphia, PA 19106

NEWMAN & ASSOCIATES, P.C.



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